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REDACTED – FOR PUBLIC INSPECTION

June 30, 2014

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Received & Inspected  
JUL 1 - 2014  
FCC Mail Room

**Re: *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208***

Dear Ms. Dortch:

On behalf of Western Telephone Company ("Western"), please find enclosed two copies of Western's FCC Form 481, along with the redacted version of the Confidential Financial Information.

Also enclosed are copies of Western's redacted five-year service quality improvement plan.

One copy of the FCC Form 481, containing Confidential Financial Information is being filed under separate cover.

Please do not hesitate to contact me at (605) 224-7889 if you have any questions regarding this submission.

Respectfully submitted,

Darla Pollman Rogers

Attorney at Law

Western Telephone Company

No. of Copies rec'd 0+1  
List ABCDE

Encl.

Robert C. Riter, Jr  
Margo D. Northrup

Darla Pollman Rogers  
Lindsey Riter-Rapp  
Robert D. Hofer, Of Counsel

Jerry L. Wattier  
Thomas Hart, Associate

<b>FCC Form 481 - Carrier Annual Reporting</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0966/OMB Control No. 3060-0815 July 2013
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<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Janelle Jessen
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	janellej@venture.coop

<b>ANNUAL REPORTING FOR ALL CARRIERS</b>	54.313 Completion Required	54.422 Completion Required
--	----------------------------------	----------------------------------

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<320>	Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed	0.0		
<420>	Mobile	0.0		
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed	0.0		
<450>	Mobile	0.0		
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<div style="border: 1px solid black; padding: 2px;">Line 510-PCC Form 481-Western.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<div style="border: 1px solid black; padding: 2px;">Line 610-PCC Form 481 - Western.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

<2000>		(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>		(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet</b>				
<3000>		(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>		(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>



(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jessen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing § 54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

5-Yr Plan 2014 - Western.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.


(200) Service Outage Reporting (Voice)  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jensen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@ventura.coop

[illegible]

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jensen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janelle@venture.coop

[illegible]



<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jessen
<035>	Contact Telephone Number - Number of person identified in data line <030>	605852224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop

[illegible]

(800) Operating Companies  
Data Collection Form  
FCG Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
JUN 2013

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL. CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jensen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop
<810>	Reporting Carrier	Western Telephone Company
<811>	Holding Company	Western Telephone Company
<812>	Operating Company	Western Telephone Company

[illegible]

**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 487

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	391608
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jessen
<035>	Contact Telephone Number - Number of person identified in data line <030>	605852224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)



(1100) No Terrestrial Backhaul Reporting  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jessen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

## (1200) Terms and Condition for Lifeline Customers

Lifeline

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL. CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jensen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop

Western Lifeline Plans 2014.pdf

&lt;1210&gt; Terms &amp; Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

&lt;1220&gt; Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

## (2000) Price Cap Carrier Additional Documentation

## Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0985/OMB Control No. 3060-0819

July 2015

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jensen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janelleja@ventura.coop

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

## Incremental Connect America Phase I reporting

<2010> 2nd Year Certification (47 CFR § 54.313(b)(1)) ☐

<2011> 3rd Year Certification (47 CFR § 54.313(b)(2)) ☐

## Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

<2012> 2013 Frozen Support Certification ☐

<2013> 2014 Frozen Support Certification ☐

<2014> 2015 Frozen Support Certification ☐

<2015> 2016 and future Frozen Support Certification ☐

## Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

<2016> Certification Support Used to Build Broadband ☐

## Connect America Phase II Reporting (47 CFR § 54.313(e))

<2017> 3rd year Broadband Service Certification ☐

<2018> 5th year Broadband Service Certification ☐

<2019> Interim Progress Certification ☐

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information



(3000) Rate of Return Carrier Additional Documentation		FCC Form 481
Data Collection Form		OMB Control No. 3060-0086/OMB Control No. 3060-0819
		JULY 2013

<010> Study Area Code 391688  
 <015> Study Area Name WESTERN TEL. CO.  
 <020> Program Year 2015  
 <030> Contact Name - Person USAC should contact regarding this data Janelle Jesson  
 <035> Contact Telephone Number - Number of person identified in data line <030> 608522224 ext.  
 <039> Contact Email Address - Email Address of person identified in data line <030> janelle.j@venture.coop

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan  
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No) ☒ Yes ☒ No

(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ Yes ☒ No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, is your company audited?

(Yes/No) ☒ Yes ☒ No

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☒

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☒

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

(3023) Underlying information subjected to a review by an independent certified public accountant ☐

(3024) Underlying information subjected to an officer certification. ☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3026) Attach the worksheet listing required information

Venture Consolidated 2013 Issued FS & Management Report.pdf, Comments on Western Telephone Company Financial Reports.docx

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	391688
<015> Study Area Name	WESTERN TEL CO.
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Janelle Jessen
<035> Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: WESTERN TEL CO.	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/27/2014
Printed name of Authorized Officer: Randy Houdek	
Title or position of Authorized Officer: General Manager/CEO	
Telephone number of Authorized Officer: 6058522224 ext.	
Study Area Code of Reporting Carrier: 391688	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form		FOC Form 481 OMB Control No. 3060-0586/OMB Control No. 3060-0819 July 2015
<010> Study Area Code	391688	
<015> Study Area Name	WESTERN TEL CO.	
<020> Program Year	2015	
<030> Contact Name - Person USAC should contact regarding this data	Janelle Jessen	
<035> Contact Telephone Number - Number of person identified in data line <030>	605852224 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



## Attachments

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2014
17.0

[illegible]

## Data Collection Form

FCC Form 481

OMB Control No: 3060-0986/OMB Control No: 3060-0819  
July 2013

<010>	Study Area Code	391688
<015>	Study Area Name	WESTERN TEL. CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jessen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janellej@venture.coop

[illegible]



## Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	391600
<015>	Study Area Name	WESTERN TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Janelle Jessen
<035>	Contact Telephone Number - Number of person identified in data line <030>	6058522224 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	janelle.j@venture.coop

<810>	Reporting Carrier	Western Telephone Company
<811>	Holding Company	Western Telephone Company
<812>	Operating Company	Western Telephone Company

[illegible]

CONFIDENTIAL  
NOT FOR PUBLIC INSPECTION

Five-Year Network Improvement Plan  
For Western Telephone Company

In its *USF/ICC Transformation Order* and subsequent Orders, the Federal Communications Commission ("FCC" or "Commission") requires Eligible Telecommunications Carriers ("ETCs") to submit a five-year build-out plan in a manner consistent with Section 54.202(a)(1)(ii) of the Commission's Rules by July 1, 2014 and to submit annual progress reports thereafter.<sup>1</sup> Section 54.202(a) (1) (ii) states in part that ETCs are to "[s]ubmit a five-year plan that describes with specificity proposed improvements or upgrades to the [ETC's] network throughout its proposed service area. Each [ETC] shall estimate the area and population that will be served as a result of the improvements . . . ."<sup>2</sup>

In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>3</sup> Western Telephone Company

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<sup>1</sup> See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Inter-carrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform—Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-61 (rel. Nov. 18, 2011) (*USF/ICC Transformation Order*) at Para. 587; pets. for review denied, Direct Comm. Cedar Valley, et al v. FCC, No. 11-9900, [www.ca10.uscourts.gov/opinions/11/11-9900.pdf](http://www.ca10.uscourts.gov/opinions/11/11-9900.pdf) (10th Cir. May 23, 2014); see also *Connect America Fund et al.*, WC Docket 10-90 et al., Order, DA 12-147 (rel. Feb. 12, 2012) at Para. 5 (amending Section 54.313(a)(1) to clarify this requirement); *Connect America Fund et al.*, WC Docket 10-90 et al., Third Order on Reconsideration, FCC 12-52 (rel. May 14, 2012) at Para. 10 (changing the filing deadline for the annual reports from April 1 to July 1); *Connect America Fund et al.*, WC Docket 10-90 et al., Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at Para's. 4, 6-9. Delaying Five Year Plan until July 1, 2014 see WC Docket No. 10-90, Order, DA 13-1115, Para. 8 (released May 16, 2013).

<sup>2</sup> 47 C.F.R. § 54.202(a) (1) (ii).

<sup>3</sup> *March 5, 2013 Order* at Para. 9 citing Section 54.202(a) (1) (ii).

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("Western" or the "Company") is a rate-of-return carrier ETC and hereby submits its five-year network improvement plan.

**I. The Challenges Faced by the Company in Providing Voice and Broadband to its Rural Service Area**

**A. Description of the Company and its Service Area**

Western Telephone Company provides telephone service to nearly [REDACTED] access lines and also provides high-speed internet service and IP video service to [REDACTED] customers. Western completed a full rebuild of all its exchanges in 2011 to a fiber-to-the-home technology. Western's service territory covers over 1,000 square miles with an overall customer density of [REDACTED] access lines per square mile. Western serves three separate exchanges in the central region of South Dakota. Because all residential and business subscribers currently have service provided via fiber facilities, there are no further significant upgrade plans for the near future.

**B. The Exchanges Contained Within the Company's Study Area**

Venture Communications Cooperative serves the combined exchange area(s) of:

Cresbard, SD	Orient, SD
Faulkton, SD	

**II. The Company Has Used and Will Use Universal Service Support Only For the Intended Purposes**

Section 254(e) of the Communications Act of 1934, as amended requires ETCs to use Universal Service support ("USF") "only for the provision, maintenance, and upgrading of facilities and services for which the support is intended."<sup>4</sup> Pursuant to Section 54.314 of the FCC's rules, in order for state-designated ETCs to receive USF for the coming year, states must annually file certifications by October 1 stating that all federal high-cost support provided to such carriers within the state "was used in the

<sup>4</sup> 47 U.S.C. § 254(e).



preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”<sup>5</sup> ETCs not designated by a state must file similar certifications with the FCC.<sup>6</sup>

In its *USF/ICC Transformation Order*, the FCC clarified that prior to making the Section 254(e) certifications, states should conduct a “rigorous examination of the factual information” contained in the annual Section 54.313 reports, of which the five year network improvement plan and annual progress reports are a part, in determining whether they can certify that carriers’ support has been used and will be used only for the purpose for which the support was intended.<sup>7</sup> The FCC said that it would also use the reports to verify certifications filed by ETCs that are not state-designated.<sup>8</sup> In this context, the Commission stated, “[i]n light of the public interest obligations we adopt in this Order, a key component of this [Section 254(e)] certification will now be that support is being used to maintain and extend modern networks capable of providing voice and broadband service.”<sup>9</sup>

Essentially, under the existing rules and processes, the federal USF received by the Company and other incumbent rural telephone companies are, in fact, an integral part of the recovery of expenditures of rural incumbent local exchange carriers incurred in the provision, maintenance and upgrading of their provision of facilities and services for

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<sup>5</sup> 47 C.F.R. § 54.314(a).

<sup>6</sup> 47 C.F.R. § 54.314(b).

<sup>7</sup> See *USF/ICC Transformation Order* at Para. 612.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* (emphasis supplied).

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which the USF is intended. Western depends upon its receipt and utilization of federal universal service support to provide rural telephone customers with affordable and quality voice and broadband services.

Accordingly, given the critical role the network improvement plan and the progress reports will have in the annual Section 254(e) certification process, Western Telephone Company's plan and progress reports will demonstrate not only how Western has used and will use USF not only for improvements and upgrades, but also for the provision and maintenance of the facilities and services to which the support was intended.

### **III. The Company's Five-Year Network Improvement Plan**

When the Commission adopted its five-year plan requirements for FCC-designated ETCs in its *2005 ETC Order*, it set forth the following criteria as to how the ETC is to describe with "specificity" the proposed improvements or upgrades to the ETC's network throughout its service area:

(1) how signal quality, coverage, or capacity will improve due to the receipt of high-cost support throughout the area for which the ETC seeks designation; (2) the projected start date and completion date for each improvement and the estimated amount of investment for each project that is funded by high-cost support; (3) the specific geographic areas where the improvements will be made; and (4) the estimated population that will be served as a result of the improvements.<sup>10</sup>

In that order, the FCC clarified that service quality improvements in the five-year plan "do not necessarily require additional construction of network facilities."<sup>11</sup> Accordingly,

<sup>10</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

<sup>11</sup> *Id.*

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the improvements listed in the plan may be projects related to the expansion of the network (one or multiple services), projects related to updating technology to accommodate new services or higher bandwidth or maintenance projects, such as to reduce trouble reports or replace outdated equipment. Additionally, in some cases, the projects may be ones that improve or upgrade the entire network rather than discrete areas within a study area or they may be ones that are ongoing projects that have no specific start and completion dates.

The instructions to the Form 481 state “[r]ecipients may describe where improvements are expected to occur by wire center or census block, as appropriate. To the extent no improvements are planned in specific areas, the five-year plan should so indicate.”<sup>12</sup> The instructions also require that in subsequent years, ETCs must file a progress report on the five-year plan, pursuant to 47 C.F.R. §54.313(a)(1), including maps explaining progress towards meeting the deployment targets, the amount of universal service support received, how support was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled in the prior calendar year. The information regarding the total amount of universal service support received must also be broken out separately by the amount spent on capital expenses and the amount spent on operating expenses.<sup>13</sup> Accordingly, the Company’s five-year plan separately provides both capital expenditures and operating expenses.

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<sup>12</sup> Instructions for Completing FCC Form 481, OMB Control No. 3060-0986 (High-Cost), OMB Control No. 3060-0819 (Low-Income), March 2014, Line 112

<sup>13</sup> Instructions for Completing FCC Form 481, OMB Control No. 3060-0986 (High-Cost), OMB Control No. 3060-0819 (Low-Income), March 2014, Line 112



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#### **A. The Company's Major Network Improvement Projects**

Based upon this framework, Appendix A reflects Western Telephone Company's major network improvement projects for the year 2015 through calendar year 2019<sup>14</sup> along with the start and completion dates, capital costs, areas and population associated with those projects. At this time, there are no major network improvement plans in place as Western Telephone Company rebuilt all of its facilities in 2011 in all three exchanges (Cresbard, Faulkton, and Orient) using a fiber-to-the-home technology.

#### **B. How These Projects Will Improve the Network**

As mentioned previously, Western Telephone Company rebuilt all of its facilities in 2011 using a fiber-to-the-home technology. Future projects include increasing broadband speed up to 1 Gigabyte service. Western Telephone Company has [REDACTED] in outstanding loans to USDA's Rural Utility Service for the fiber-to-the-home construction that was completed in 2011. Western will rely on future universal service funding to help make the loan payments related to this investment.

#### **C. Estimated Capital Expenditures and Operating Expenses**

The first table in Appendix B included herein specifies the Capital Expenditures (projects) in Appendix A, by Part 32 account, along with the respective year in which the expenditures are expected to occur. In the second table of Appendix B, the projected operating expenses are provided, including depreciation expense for both embedded plant

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<sup>14</sup> Although the FCC has not specified what it considers to be "year one" of the five year plan, the Company believes that it is the FCC's intent for the calendar year 2015 to be considered "year one" due to the fact that the first progress report on the plan is due July 1, 2015 and all of the other reporting requirements contained in Section 54.313 are based on the calendar year.

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investment and for Capital Expenditures, which begins when the Capital Expenditures are projected to be placed into service.

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Study Area Code 391688  
 Study Area Name Western Telephone Company  
 Company Contact Name Janelle Jessen  
 Contact Telephone Number 605-852-2224  
 Contact Email Address janellej@venture.coop

## PART A - PROJECT LIST FOR 2015-2019

Project	Start Date	Completion	Areas	Population(1)	Total Dollars
New Buried Drops	5/1/2015	12/31/2015	Cresbard, Faulkton & Orient	1,000	
New Buried Drops	5/1/2016	12/31/2016	Cresbard, Faulkton & Orient	1,000	
New Buried Drops	5/1/2017	12/31/2018	Cresbard, Faulkton & Orient	1,000	
New Buried Drops	5/1/2018	12/31/2018	Cresbard, Faulkton & Orient	1,000	
New Buried Drops	5/1/2019	12/31/2019	Cresbard, Faulkton & Orient	1,000	
Totals					\$ 75,000.00



# REDACTED – FOR PUBLIC INSPECTION

Study Area Code 391688  
 Study Area Name Western Telephone Company  
 Company Contact Name Janelle Jessen  
 Contact Telephone Number 605-852-2224  
 Contact Email Address janellej@venture.coop

## Part B: 5-Year Proposed Capital Expenditures and Operating Expenses

Regulated Capital Expenditure (CapEx) Projections						
Account	Description	2014	2015	2016	2017	Total Projected CapEx 2015-2019
2111 & 2121	Land & Building	\$ -	\$ -	\$ -	\$ -	\$ -
2112	Vehicles	\$ -	\$ -	\$ -	\$ -	\$ -
2122-2124	Support Assets	\$ -	\$ -	\$ -	\$ -	\$ -
2210	Switching Equipment	\$ -	\$ -	\$ -	\$ -	\$ -
2232	Circuit Equipment	\$ -	\$ -	\$ -	\$ -	\$ -
2410	Cable & Wire Facilities	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
1220	Materials & Supplies	\$ -	\$ -	\$ -	\$ -	\$ -
	Total Capital Expenditures	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000

Regulated Operating Expenditure (OpEx) Projections						
Account	Operating Expenses	2014	2015	2016	2017	Total Operating Expenses 2015-2019
6110-6120	General Support Maintenance	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6210	Switching Maintenance	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6230	COE Transmission Maintenance	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6410	Cable & Wire Facilities	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6530	Non-Specific (Testing, Plant Op., Engineering)	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6561-2110	General Support Depreciation	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6561-2210	Switching Depreciation	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6561-2230	Circuit Equip Depreciation	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6561-2410	Cable & Wire Depreciation	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6610-6620	Customer Operations	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
6711-6720	Corporate Operations	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
7240	Ad Valorem Expense	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 1,000,000	\$ 4,000,000
	Total Operating Expenses	\$ 14,000,000	\$ 14,000,000	\$ 14,000,000	\$ 14,000,000	\$ 56,000,000

**Line 510**

**Processes and Procedures to Ensure Compliance with Service Quality Standards  
and Consumer Protection Rules  
Per FCC Form 481 Instructions**

This document details the processes and procedures that Western Telephone Company Cooperative (the "Company") follows to ensure compliance with service quality standards and consumer protection rules as laid out in FCC Form 481 Instructions.

The company provides voice grade access to the public switched telephone network (PSTN) at a flat rate. Enabling access to emergency services provided by local government or other public safety organizations such as 911.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure safe adequate and continuous service at all times.

In addition, employees are periodically trained on service quality standards and consumer protection issues. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues beyond the normal guidelines in place for resolution of customer complaints. A recent example is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. Internally a compliance officer ensures annual employee training and dictates disciplinary process for improper use of consumer information. If concerns arise beyond the compliance officer legal counsel is sought to assist with a resolution.

If complaints are filed with the Company related to service quality standards or consumer protection rules, the complaint is immediately investigated, the matter tracked and any corrective action noted. This process ensures that problems are addressed and corrections made. It should be noted that the Company has received no customer complaints in the past five years regarding service quality standards or consumer protection rules as they relate to the service offered by the Company.

The Company advertises the availability of its services and the charges using media of general distribution and on its website.

## STATEMENT DEMONSTRATING FUNCTIONALITY IN EMERGENCY SITUATIONS.

At line 600 of FCC Form 481, Western Telephone Company Cooperative certified that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(1)(ii). This means that Western Telephone Company Cooperative has reasonable amount of back-up power to ensure functionality without an external source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. This statement will detail how Western Telephone Company is prepared to ensure continued service in an emergency situation.

### Back-Up Power

Western Telephone Company has a back-up generator available with a minimum of a four hour power supply for its central office. In addition, it has portable generators available for remote sites.

### Rerouting of Traffic around Damaged Facilities

Western Telephone Company has route redundancy for long distance service, E-911 trunking and SS7 signaling trunking.

In the case of isolated groups of customers that may suffer damage due to a cable cut, Western Telephone Company maintains sufficient staff and other resources to be able to put customers back in service in a very short amount of time. Western Telephone Company emergency service equipment is located within its exchange and requires very little time to dispatch.

### Traffic Spikes

Western Telephone Company outside plant is designed, engineered and built with sufficient capacity to handle traffic spikes resulting from emergency situations and has been able to do so in the past. Western Telephone Company is in an area where severe weather strikes periodically and has been able to handle communication needs at those times and has the experience from those situations to be able handle such emergency situations in the future.



## Western Telephone Company

### Description of Lifeline Terms and Conditions

#### For Form 481 Line 1220 thru 1223

Western Telephone Company offers Lifeline service to each of its customers. Western customers who submit a completed application as well as supporting documentation to verify that the customer is eligible for a Lifeline discount are subscribed to a Lifeline discount of \$9.25 per month. If a customer disconnects service for any reason, they must reapply as a new Lifeline subscriber when service is reconnected. There are no limits on the number of minutes included in the Lifeline plan. Lifeline subscribers may choose to have no toll service at no additional charge. If the Lifeline subscriber chooses to subscribe to toll service, the customer is charged a per call rate and/or a monthly fee depending on which toll plan the customer subscribes to and which toll carrier the customer chooses to provide long distance service.